

EXHIBIT C

I.
Parties

Plaintiffs, LUZ DEL CARMEN SALAZAR, Individually and As Next Friend of ALAN JACKOBS ALVAREZ SALAZAR, A Minor, are residents of Mexico.

Plaintiffs, KARLA CABRERA MORALES, Individually and As Next Friend of JOSHUA SANDOVAL CABRERA, A Minor, are residents of Mexico.

Plaintiff, YVONNE CARRILLO, is a resident of Mexico.

Defendant, WIRECO WORLDGROUP, INC., formerly known as Wire Rope Corporation of American, Inc., (hereinafter referred to as "WIRECO"), is a corporation licensed to do business in Texas with an office and registered agent for service in Texas, the C. T. Corporation System, 350 N. St. Paul Street, Dallas, Texas.

Defendant, WIRECO WORLDGROUP, INC., d/b/a UNION WIRE ROPE (hereinafter referred to as "UNION"), is a corporation doing business in the State of Texas. It has an office and registered agent for service in Texas, the C. T. Corporation System, 350 N. St. Paul Street, Dallas, Texas.

Defendant, CAMESA, INC., formerly known as Aceros Camesa (hereinafter referred to as "CAMESA"), is a corporation licensed to do business in the State of Texas and can be served with process by serving its registered agent, Mr. E. H. Thornton, Jr., 1775 St. James Place, Houston, Texas 77056.

Defendant, KENNEDY WIRE ROPE & SLING COMPANY, is a corporation licensed to do business in the State of Texas. It can be served with process by serving its registered agent, Garland Kennedy, Sr., 302 Flato Road, Corpus Christi, Texas 78405.

Defendant, BRIDON-AMERICAN CORPORATION, is a corporation doing business in the State of Texas. It can be served with process by serving its registered agent, the C. T. Corporation System, 350 N. St. Paul Street, Dallas, Texas.

Defendant, CERTEX USA, INC., is a corporation doing business in the State of Texas. It can be served with process by serving its registered agent, the C. T. Corporation System, 350 N. St. Paul Street, Dallas, Texas.

Defendant, HOLLOWAY-HOUSTON, INC., is a corporation doing business in Texas. It can be served with process by serving its registered agent, Mr. Charles M. Chapman, Jr., 5833 Armour Drive, Houston, Texas 77020.

Defendant, NOBLE DRILLING (U.S.) INC. (hereinafter referred to as "NOBLE"), is licensed to do business in the State of Texas. It can be served with process by serving its registered agent, the C. T. Corporation System, 350 N. St. Paul Street, Dallas, Texas.

Defendant, SOUTHWEST WIRE ROPE, LP (hereinafter referred to as "SOUTHWEST", is an entity doing business in Texas. It can be served with process by serving its registered agent, the Corporation Service Corporation, 701 Brazos #1058, Austin, Texas 78701

Defendant, THE OFFSHORE DRILLING COMPANY, is a corporation licensed to do business in the State of Texas. It can be served with process by serving its registered agent, the Capital Corporate Services, Inc., 800 Brazos, Suite 400, Austin, Texas 78701.

II. Jurisdiction and Venue

Jurisdiction is proper in this Court because the Plaintiffs have suffered damages within the jurisdictional limits of this Court.

Venue is proper in Harris County, Texas pursuant to TEX. CIV. PRAC. & REM. CODE ANN. § 15.002(a)(3) because on or more of the Defendants have principal offices in Harris County.

III.
Facts

Plaintiffs would show that on or about April 25, 2007, Jorge Alvarez Aleman, husband of Plaintiff, Luz Del Carmen Salazar and father of Alan Jackobs Alvarez Salazar, a Minor; Jose Abraham Sandoval Jimenez, husband of Plaintiff, Karla Cabrera Morales and father of Joshua Sandoval Cabrera, a Minor, and Rafael Castillo Flores, husband of Yvonne Carrillo, were working on an offshore platform in the Gulf of Mexico when a wire cable broke, causing Jorge Alvarez Aleman, Jose Abraham Sandoval Jimenez and Rafael Castillo Flores, to be crushed by falling equipment. The wire rope at issue was designed, manufactured, maintained, and inspected by the Defendants in this case. Jorge Alvarez Aleman, Jose Abraham Sandoval Jimenez and Rafael Castillo Flores, died of the injuries they received as a result of this occurrence.

To the extent that any of the above-named Defendants are conducting business pursuant to a trade name or assumed name, then suit is brought against them pursuant to the terms of TEX. R. Civ. P. 28, and the Plaintiffs hereby demand that upon answering this suit, that they answer in their correct legal name and assumed name.

IV.
Negligence

Plaintiffs would show that Defendants committed acts of negligence which were a proximate cause of the deaths of Jorge Aleman, Jose Jimenez and Rafael Flores. Specifically, Plaintiffs would show that Defendants failed to ensure that the cable was not defective before it was allowed to be used on the platform in question. As a result, the defective cable broke proximately causing the deaths of Jorge Aleman, Jose Jimenez and Rafael Flores, and Plaintiffs' damages.

V.

Breach of Express and Implied Warranties

Due to the negligence of Defendants, the wire rope was not fit for its intended use. Distribution of the product by the Defendants in such condition breached the express warranty against defects and implied warranty that the product was suitable for use. By breaching express and implied warranties, Defendants proximately caused the injuries and damages suffered by the Plaintiffs.

VI.

Strict Liability in Tort

As designed, assembled, inspected, maintained, and placed in the stream of commerce, the cable was unsafe, defective and unreasonably dangerous to Jorge Alvarez Aleman, Jose Abraham Sandoval Jimenez and Rafael Castillo Flores. The cable was being used as it was intended. As a result, Jorge Alvarez Aleman, Jose Abraham Sandoval Jimenez and Rafael Castillo Flores, suffered fatal crushing injuries that would not have occurred had the cable not broken. Accordingly, Defendants are strictly liable to Plaintiffs for their injuries and damages. The Plaintiffs therefore invoke the doctrine of strict liability discussed in §402A, Restatement of the Law of Torts, 2nd.

VII.

Damages

This is a claim for the Wrongful Death of Jorge Alvarez Aleman, Jose Abraham Sandoval Jimenez and Rafael Castillo Flores, caused by the Defendants. This action is brought by Plaintiffs on behalf of themselves and all other wrongful death beneficiaries. This action is brought pursuant to Tex. Civ. Prac. & Rem. Code 71.001 et. seq., also known as the Texas Wrongful Death Act. As a result of the deaths of Jorge Alvarez Aleman, Jose Abraham Sandoval Jimenez and Rafael Castillo Flores, Plaintiffs are entitled to recover those damages they have sustained, including:

- a. the loss of care, maintenance, support, services, advice, counsel, and reasonable contributions of a pecuniary value that Plaintiffs would have received from Jorge Alvarez Aleman, Jose Abraham Sandoval Jimenez and Rafael Castillo Flores, both in the past and in the future;
- b. the loss of companionship and society and positive benefits flowing from the love, comfort, companionship, and society that Plaintiffs would have received from Jorge Alvarez Aleman, Jose Abraham Sandoval Jimenez and Rafael Castillo Flores, both in the past and in the future;
- c. and the mental anguish, emotional pain, torment, and suffering experienced by Plaintiffs as a result of the deaths of Jorge Alvarez Aleman, Jose Abraham Sandoval Jimenez and Rafael Castillo Flores, both in the past and in the future.

These claims are brought by Plaintiffs for the benefit of the Estates of Jorge Alvarez Aleman, Jose Abraham Sandoval Jimenez and Rafael Castillo Flores, for the damages, suffering, and injuries suffered by Jorge Alvarez Aleman, Jose Abraham Sandoval Jimenez and Rafael Castillo Flores, prior to their deaths, pursuant to Tex. Civ. Prac. & Rem. Code 71.021, also known as the Texas Survival Statute.

VIII.
Request for Disclosure

Pursuant to Rule 194, you are requested to disclose, within 50 days of service of this request, the information or material described in Rule 194.2.

IX.
Jury Demand

Plaintiffs request a trial by jury.

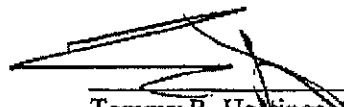
PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiffs pray that Defendants be cited to appear and answer herein; that upon final trial of this cause, Plaintiffs recover:

1. judgment against Defendant for Plaintiffs' damages as set forth above;
2. post-judgment interest at the legal rate from the date of judgment;
3. pre-judgment interest as allowed by law;
4. costs of court; and
5. such other and further relief to which Plaintiffs may be entitled.

Respectfully submitted,

HASTINGS LAW FIRM, P.C.



Tommy R. Hastings
State Bar No. 24031637
616 FM 1960 West, Suite 725
Houston, Texas 77090
Phone: (281) 466-1396
Fax No.: (281) 466-1887

ATTORNEYS FOR PLAINTIFF



**Service of Process
Transmittal**

05/05/2009

CT Log Number 514816882



TO: Keith McKinnish, Sr. VP & CFO
WireCo WorldGroup Inc.
12200 NW Ambassador Dr.
Kansas City, MO 64163-1244

RE: Process Served in Texas

FOR: WireCo WorldGroup Inc. (Domestic State: DE)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION:	Luz Del Carmen Salazar, Individually and as Next Friend of Alan Jackobs Alvarez Salazar, a Minor, Karla Cabrera Morales, Individually and as Next Friend of Joshua Yerit Sandoval Cabrera, a Minor, and Yvonne Carrillo, Pltf. vs. Wireco Worldgroup, Inc., et al., Dfts.
DOCUMENT(S) SERVED:	Citation, Original Petition and Request for Disclosure
COURT/AGENCY:	55th Judicial District Court Harris County, TX Case # 200923132
NATURE OF ACTION:	Wrongful Death - On or about April 25, 2007 while working on an offshore platform, Pltf's. husbands were killed when a wire cable broke
ON WHOM PROCESS WAS SERVED:	The Corporation Company, Dallas, TX
DATE AND HOUR OF SERVICE:	By Process Server on 05/05/2009 at 10:30
APPEARANCE OR ANSWER DUE:	By 10:00 a.m. on the Monday next after the expiration of 20 days after you were served - file written answer // Within 50 days - Request for Disclosure
ATTORNEY(S) / SENDER(S):	Tommy R. Hastings Hastings Law Firm P.C. 616 FM 1960 West Suite 725 Houston, TX 77090 281-466-1396
ACTION ITEMS:	SOP Papers with Transmittal, via Fed Ex 2 Day , 791994456061 Email Notification, Keith McKinnish keithmckinnish@wirecoworldgroup.com
SIGNED:	The Corporation Company
PER:	Beatrice Casarez
ADDRESS:	350 North St Paul Street Suite 2900 Dallas, TX 75201
TELEPHONE:	214-932-3601

REC. NUMBER 371090 0.00
TRACKING NUMBER 72403182 MTA

CAUSE NUMBER 200923132

PLAINTIFF: SALAZAR, LUZ DEL CARMEN (INDIVIDUALLY AND AS NEXT
VS.
DEFENDANT: PETROLEUM SUPPLY COMPANYIn The 55th
Judicial District Court of
Harris County, TexasTHE STATE OF TEXAS
County of Harris

CITATION CORPORATE

Date Del: 5/5/09
Time: 10:30am
Initials: AHRTO: WIRECO WORLDGROUP INC (DBA UNION WIRE ROPE) (CORPORATION) BY SERVING
ITS REGISTERED AGENT C T CORPORATION SYSTEM
350 N ST PAUL STREET DALLAS TX 75201Attached is a copy of PLAINTIFF'S FIRST AMENDED PETITION AND REQUEST FOR
DISCLOSUREThis instrument was filed on the 23rd day of April, 20 09, in the
above cited cause number and court. The instrument attached describes the claim against you.YOU HAVE BEEN SUED; you may employ an attorney. If you or your attorney do not file a written answer with the
District Clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of 20 days after you were
served this citation and petition, a default judgment may be taken against you.

TO OFFICER SERVING:

This Citation was issued under my hand and seal of said Court, at Houston, Texas, this 23rd day of
April, 20 09.Issued at request of:
HASTINGS, TOMMY RAY
616 FM 1960 W. STE 725
HOUSTON, TX 77090
Tel: (281) 466-1396
Bar Number: 24031637LOREN JACKSON, District Clerk
Harris County, Texas
201 Caroline, Houston, Texas 77002
P.O. Box 4651, Houston, Texas 77210

Generated by: CUERO, NELSON 7MM/U1K/8386579

OFFICER/AUTHORIZED PERSON RETURN

I received this citation on the _____ day of _____, 20____, at _____ o'clock ____ M., endorsed
the date of delivery thereon, and executed it at _____,

(street address)

(city)

in _____ County, Texas on the _____ day of _____, 20____, at _____ o'clock ____ M.,
by delivering to _____,

(the defendant corporation named in citation)

_____, in person, whose name is _____,
(registered agent, president, or vice-president)a true copy of this citation, with a copy of the _____ Petition attached,
(description of petition, e.g., "Plaintiffs Original")and with accompanying copies of _____
(additional documents, if any, delivered with the petition)

I certify that the facts stated in this return are true by my signature below on the _____ day of _____, 20____.

FEE: \$ _____

By: _____

(signature of officer)

Printed Name: _____

As Deputy for: _____

(printed name & title of sheriff or constable)

Affiant Other Than Officer

On this day, _____, known to me to be the person whose signature
appears on the foregoing return, personally appeared. After being by me duly sworn, he/she stated that this citation was
executed by him/her in the exact manner recited on the return.

SWORN TO AND SUBSCRIBED BEFORE ME, on this _____ day of _____, 20____

Notary Public

RECEIPT NUMBER 371090 0.00
 TRACKING NUMBER 72403182 MTA

CAUSE NUMBER 200923132

PLAINTIFF: SALAZAR, LUZ DEL CARMEN (INDIVIDUALLY AND AS NEXT
 vs.
 DEFENDANT: PETROLEUM SUPPLY COMPANY

In The 55th
 Judicial District Court of
 Harris County, Texas

THE STATE OF TEXAS
 County of Harris

CITATION CORPORATE

Date Del: 5/5/09
 Time: 10:30 AM
 Initials: HR

TO: WIRECO WORLDGROUP INC (DBA UNION WIRE ROPE) (CORPORATION) BY SERVING
 ITS REGISTERED AGENT C T CORPORATION SYSTEM
 350 N ST PAUL STREET DALLAS TX 75201

Attached is a copy of PLAINTIFF'S FIRST AMENDED PETITION AND REQUEST FOR
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TO OFFICER SERVING:

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April, 20 09.

Issued at request of:
 HASTINGS, TOMMY RAY
 616 FM 1960 W. STE 725
 HOUSTON, TX 77090
 Tel: (281) 466-1396
 Bar Number: 24031637



Loren Jackson
LOREN JACKSON, District Clerk
 Harris County, Texas
 201 Caroline, Houston, Texas 77002
 P.O. Box 4651, Houston, Texas 77210

Generated by: CUERO, NELSON 7MM/U1K/8386579

OFFICER/AUTHORIZED PERSON RETURN

I received this citation on the _____ day of _____, 20____, at _____ o'clock ____ M., endorsed
 the date of delivery thereon, and executed it at _____,
 (street address) (city)
 in _____ County, Texas on the _____ day of _____, 20____, at _____ o'clock ____ M.,